

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

No. 5:17-CR-91-1BR  
No. 5:17-CR-91-2BR

FILED  
MAR 24 2017  
Peter A. Moore Jr. CLERK  
US DISTRICT COURT, EDC  
BY [Signature] DEP CLK

UNITED STATE OF AMERICA

v.

CRIMINAL INFORMATION

Fed. R. Crim. P. 7

KENNETH PRESTON BLEVINS  
MICHAEL BANKS

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

*(Theft and conversion of government property  
and aiding and abetting others  
in violation of 18 U.S.C. §§ 641 and 2)*

BACKGROUND

1. Defendant KENNETH PRESTON BLEVINS (hereinafter referred to as "BLEVINS") was a Specialist (E-4) in the United States Department of the Army assigned to the Forward Support Company of the 1st Battalion, 3rd Special Forces Group. BLEVINS was a cook with a military occupational specialty of "92G," that is, a food service specialist responsible for the preparation and service of food in field or garrison food service operations.

2. Defendant MICHAEL BANKS (hereinafter referred to as "BANKS") was a Specialist (E-4) in the United States Department of the Army assigned to the Forward Support Company of the 1st Battalion, 3rd Special Forces Group. BLEVINS was a cook with a

military occupational specialty of "92G," that is, a food service specialist responsible for the preparation and service of food in field or garrison food service operations.

3. From on or about September 1, 2012 through April 30, 2013, BLEVINS was deployed with his unit to Afghanistan. BLEVINS was assigned to the dining facility at Camp Dyer, the Special Forces camp at Jalalabad Air Base.

4. From on or about September 2, 2012 through March 30, 2013, BANKS was deployed with his unit to Bagram Air Field in Afghanistan. Within a few months, BANKS was re-assigned to the dining facility at Camp Dyer, the Special Forces camp at Jalalabad Air Base.

5. Jalalabad Air Base is a United States military base located approximately 80 miles east of Kabul, Afghanistan.

6. The United States Department of Defense is a department of the United States that provides military forces needed to deter war and to protect the security of our country, and manages military installations and facilities on behalf of the United States, including Jalalabad Air Base.

7. During his deployment, BLEVINS stole food and beverages belonging to the United States Department of Defense, and gave the stolen items to local national workers to take off base and sell

at a local bazaar.

8. BANKS, who ordered food for the Dining Facility, was aware and facilitated the theft scheme by managing food and supply orders and concealing the thefts through replacement of the stolen goods.

9. BLEVINS split the proceeds of theft with the local national workers, BANKS, and others.

10. BLEVINS and BANKS sent a portion of their criminal proceeds back to the United States via Western Union.

#### THE OFFENSE

11. Beginning in or about September 1, 2012, through April 30, 2013, the exact dates being unknown, in the Eastern District of North Carolina, in Afghanistan, and elsewhere, KENNETH PRESTON BLEVINS and MICHAEL BANKS, defendants herein, did knowingly and unlawfully embezzle, steal, purloin, and convert to their use, and the use of another, things of value of the United States and a department and agency thereof, the value of which in the aggregate did exceed the sum of \$1000, and did aid and abet each other and others in so doing, all in violation of Title 18, United States Code, Sections 641 and 2, and pursuant to Title 18, United States Code, 3238.

### FORFEITURE NOTICE

As a result of the offense set forth in Count One of this criminal information, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said offense.

The forfeitable property includes, but is not limited to:

(1) U.S. currency in the amount of \$34,500 for KENNETH PRESTON BLEVINS and U.S. currency in the amount of \$5,000 for MICHAEL BANKS;

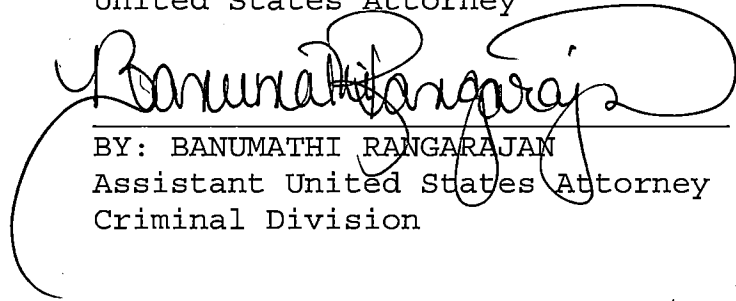
If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of said defendant up to the value of the above forfeitable property.

JOHN STUART BRUCE  
United States Attorney



BY: BANUMATHI RANGARAJAN  
Assistant United States Attorney  
Criminal Division